

PORTALE | RANDAZZO

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March 27, 2025

VIA ECF

Magistrate Judge Victoria Reznik
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10606

Re: Taranto v. Putnam County, et al.
21-cv-02455 (VR)

Dear Judge Reznik:

I write with the consent of Mr. Gambino to advise you that all discovery has been completed in the above-referenced matter. Defendants intend to move for summary judgment and I am requesting until April 11, 2025, to file the required pre-motion letter.

Thank you for your courtesies.

Respectfully,

/s/ James A. Randazzo
James A. Randazzo

JAR/cp
cc: Counsel of Record (Via ECF)